

Sinco Technologies Pte Ltd. v. Sinco Electronics (Dongguan) Co. Ltd., *et al*

# APPENDIX D.2

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## DEFENDANTS' DEPO DESIGNATIONS & PLAINTIFF'S OBJECTIONS

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**ROPER MAJESK PC**  
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*Attorneys for Plaintiff*  
SINCO TECHNOLOGIES PTE LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SINCO TECHNOLOGIES PTE LTD,

Plaintiff,

V.

SINCO ELECTRONICS (DONGGUAN) CO., LTD.; XINGLE ELECTRONICS (DONGGUAN) CO., LTD.; XINGKE ELECTRONICS TECHNOLOGY CO., LTD.; SINCOO ELECTRONICS TECHNOLOGY CO., LTD.; MUI LIANG TJOA (an individual); NG CHER YONG aka CY NG (an individual); and LIEW YEW SOON aka MARK LIEW (an individual).

#### Defendants.

Case No. 3:17CV5517

**PLAINTIFF SINCO TECHNOLOGIES  
PTE LTD'S OBJECTIONS TO  
DEFENDANTS' DEPOSITION  
DESIGNATIONS AND NOTICE OF  
COUNTER-DESIGNATIONS**

## PRETRIAL HEARING

Date: October 5, 2021

Date: October 1

Place: Courtroom 5 – 17<sup>th</sup> Floor  
Hon. Edward M. Chen

TRIAL DATE

November 1, 2021

1 Plaintiff SinCo Technologies Pte. Ltd, ("SINCO") hereby provides objections and counter  
 2 designations to Defendants' identified Deposition testimony. Any designation including  
 3 discussion by the attorney, other than objections, with the witness are intended as it provides  
 4 context for later testimony.

ABBREVIATION	OBJECTIONS
106	Rule of completeness to designation. (page:line to page:line). Objections removed.
401/402	Testimony in designation not relevant to claims or defenses in this action.
403	Designation causes unfair prejudice, confuses the issues, misleads the jury, wastes time (asked and answered).
609	Presumption Against Reference to Prior Conviction over ten years old. <sup>1</sup>
MIL	Subject to motion <i>in limine</i> .
LC	Calls for legal conclusion.
RD	Testimony is not based on Personal Knowledge, but simply reading a document provided by counsel.
NR	Non-responsive; no question pending.
SPEC	Calls for speculation.
V	Vague.
M	Misstates the testimony.

20 Any objections are presumed removed from any deposition testimony read or played  
 21 before the Jury. Defendants designations were inconsistent<sup>2</sup> in skipping or designation of attorney  
 22 objections along with designation of the counsel asking the question (which is not spoken, and  
 23 not on the video), in either event such material would not be read or appear on the deposition  
 24 video. SINCO's counter designations again assumes that any objections by counsel will be  
 25 removed from the testimony, as well as reference to the attorney asking the question.  
 26

27 <sup>1</sup> Defendants' Deposition Designations is not Proper Notice as required under FRE 609.

28 <sup>2</sup> For Example: Bryan Lim 19:3; 25:18; 59:13-19; 62:17-20; 80:23 and 85:22 (Defendants designating objections) 39:17; 40:3; 42:21; 47:20; 48:8 and 17; 51:17; 56:4 and 11; 57:18; 64:20 and 65:7 (Defendants designating attorney name). Many more are included not herein referenced.

**COUNTER-DESIGNATIONS AND OBJECTIONS**

These counter-designations anticipate the removal of objections and interaction not in the form of a question by counsel as presented to the Jury.

**I. Minh Chi Nguyen (United States)**

**DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018**  
*(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
5:25-6:8			
8:1-9:8			
9:10 – 9:17			
9:19-21			
9:24-10:1			
10:13-10:24	106	10:8-;11:1	
11:22-13:12	106	11:19-13:18	
14:6-10			
14:13-14			
14:17-23			
15:8-16:21			
17:21-18:6	106 SPEC	17:21-18:20; 20:2-21:16; 25:7-26:18 and 27:24-28:7	
18:12-13			
31:11-31:23	106	31:11-31:25	
37:12-38:2	106	36:4-38:13	
52:11-53:12	106	52:11-54:25 and 55:3-62:24	
56:5-60:19			
62:15-18			

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2                   **DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018**  
3                   *(Page and Line Numbers)*

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
63:15-21	106	63:2-63:25	
64:21-65:19	106	64:9-67:23	
71:22-72:2	106 M	70:1-72:2	
72:14-73:7	106	72:14-73:21	
99:24-101:3	106	98:21-101:23	
101:24-102:5			
106:9-107:6	106	103:16-110:18	
109:2-110:18			
113:8-23	106	113:8-114:25	
146:3-147:18	106	146:3-147:24; 149:7-24 and 150:1-151:20	
151:12-152:13			
154:9-156:4	106	154:9-157:1 and 157:3-8	
156:6-19			
157:9-19	106	157:9-159:24	
158:14-24			
163:25-165:12	106	163:8-165:12	
168:2-19	106	165:19-171:18	
171:22-172:13	106	171:22-172:15	
185:6-19	106	184:17-185:19	

26                   SINCO intends on calling this witness to testify live at trial.  
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## II. BRYAN LIM (Singapore)

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	5:3-4			
	5:5-11			
	5:16-6:6			
8:10-11:7				
	9:1-12:13	106	8:10-12:13	
11:17-24				
13:3-16	13:3-11	106	12:20-13:16	
14:2-15:16	14:2-14:6	106	14:2-16:4	
	15:8-25			
	17:6-18:3	106	16:18-23:4	
	18:6-17			
	19:2-9			
	19:12-13			
	19:16-20:1			
	20:4-8			
	20:14-16			
	20:18			
	20:21-21:5			
	21:20-23:4			
	24:1	401/402 NR		
24:2-25:15				

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	25:16-27:14			
25:22-27:14		106	25:16-28:25	
	29:1-4	M		
	29:7	RD L 401/402 403		
	29:9-12	L 401/402 403		
	29:16	401/402 403		
	30:12-17			
	30:21	L 401/402 403		
	30:23-24			
	31:2-9			
	31:11	106	30:23-31:22	
	31:19-22			
	32:1-3			
32:5-38:15	32:5-6	401/402		
	32:10-13	106		
	33:15	401/402		
	33:17-35:12	106		
	35:15-36:21	106		
	36:23-38:15	106		
	38:23-39:11	106		
39:6-40:13	39:13-24	M 106		
	40:1-14	106		

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	41:7-42:8	106	41:7-42:11	
41:11-42:1				
	42:12-43:15	42:12-15 106 V		
		42:18-23 106 V		
		43:2-19 106 M		
		43:21-22 106		
		43:24-44:2 V 106		
		44:4 106		
		44:7-8 106		
		44:10-45:21		
		45:23-46:11 106	45:23-46:22	
	46:23-47:16	46:23-25 47:4-9 V 106 47:11-13	46:23-47:16	
		47:19-48:5		
		48:7-48:14		
		48:16-51:10		
	49:12-51:6		47:15-54:11	
		51:12-13		
		51:15-19		
		52:22-54:16		

**ROPER S**  
**M A J E S K I**  
 A Professional Corporation  
 Menlo Park

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
51:20-54:11				
	54:20-24	V		
54:20-55:6	55:1-2	V		
	55:4-13	403 401/402 LC		
	55:18-23	403 401/402 LC L		
	56:1-7	403 401/402 LC L		
	56:9-15	403 401/402 LC		
	56:18-24	403 401/402 LC		
	57:2	403 401/402 LC		
	57:4-13	403 401/402 LC		
	57:16-24	NR 401/402 LC		
	58:3-9	NR 401/402 LC L		
	58:12-59:1	403 401/402 LC		
	59:4-10	403 401/402 LC		
	59:13-19	NR L		
	59:22-25			
	61:1-62:13	106	59:20-62:16	
	62:17-20	401/402 NR	62:17-24	
	63:12-17	403 401/402 LC		
	63:20-64:16		63:12 -65:16	

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	64:19-65:2			
	65:5 - 16			
64:24-68:18	65:17-66:12			
	66:17-67:22			
	68:1-20			
	68:23-25	106	65:17-72:8	
	69:2-20			
69:4-11				
	70:2-72:4			
	72:18-77:11			
	77:25-78:23			
	79:2-81:6	106	72:18-85:12	
	82:24-83:2			
	84:8-85:12			
	85:18-21			
	85:25-87:6			
	87:8-88:19	106	85:18-91:14	
84:10-92:19	89:21-90:7			
	90:10-91:6			
	91:12-14	106	91:12-99:6	
	91:18			

**ROPERSMAJESKI**  
 A Professional Corporation  
 Menlo Park

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	91:20-93:1			
	93:23-95:1			
94:10-96:5	95:3-9			
	95:12-96:18			
97:5-98:23	97:5-98:9			
	98:11-99:4			
	99:6			
	99:10-100:17	V		
99:14-100:17				
	101:5-10			
101:15-102:21		106	101:5-102:21; 103:1-105:4 and 106:18-23	
103:1-105:4				
106:18-23				
108:22-111:4		V 106	108:22-111:12	
	110:19-111:12			
	112:2-11	401/402 403 RD LC L		
	112:24-113:12	401/402 403 RD LC L		
	113:15-16	401/402 403 RD LC L		
	113:18-114:1	401/402 403 RD LC L		
114:23-115:12	114:25-115:3	106	114:23-115:20	
	115:9-12	106	114:23-115:20	
	116:25-117:7	106	116:15-117:7	

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	118:11-14			
	118:16			
	118:18-119:7			
118:22-119:5		106	117:10-120:20	
	119:9-10			
	119:12-22			
	120:1-4			
120:6-20				
	121:10-13			
	121:17-22	106	121:4-122:20	
121:18-122:20	121:24-122:4			
	123:1-3	V 106		
	123:6	106		
	123:8	V 106		
	123:10-14	V 106	123:1-124:11	
	123:16-17	106		
	123:19-20	L 106		
	123:22-124:11	106		
	127:9-128:2			
	128:4-5	106	124:21-125:24; 126:9-128:5	
	133:22-134:5	106	133:22-134:14	
	136:6-22	106	136:6-138:11	

**DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019**  
*(Page and Line Numbers)*

PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	136:25-137:20			
	138:24-140:15			
139:21-143:7	140:19-141:5	106	138:24 -143:7	
	153:19-22			
	154:9-155:13	106	153:19-155:25	
	155:15-25			
	156:23-162:3	V LC RD		
156:23-158:4			156:23-158:4	
	165:16-17			
	165:20-166:24			
165:24-175:19	167:2-23			
	168:20-169:17	106 RD	165:16-171:10 and 172:2-174:12	
	169:21-170:4			
	170:6			
	170:19-171:4			
	174:14-175:19			
177:2-178:18				
	179:2-180:23			
179:22-180:19		106	179:2-184:12	
	181:4-18			
181:19-184:12				
	185:9-186:11	M		

1       **III. JONATHAN CHEE (Singapore)**

<u>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</u> <i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
6:4-11			
6:22-24	401/402		
7:12-16			
8:10-13			
8:18-25			
9:15-25	609 MIL4 403 EXCL		
13:2-5			
16:6-17:17	401/402 106	16:6-17:14	
17:23-18:16	106	17:23-21:25	
25:5	106	25:1-31:16	
25:7-28:16	106		
28:18-19	106		
28:21-29:20	106		
39:18-42:8	106	38:11-44:17	
42:19-44:17			
47:4-49:18			
49:21-50:22			
51:1-15			
52:17-56:25	106	52:17-54:12 and 54:22-58:17	
63:18-64:19	401/402 106	63:3-64:14	

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
64:24-25			
65:3-66:11			
66:13-14			
66:16-67:15	401/402 106	64:15-70:6	
67:18-68:1			
68:5			
68:7-70:6			
71:4-8	106	71:4-8; 72:14-73:1 and 73:3-15	
73:16-25			
74:3			
74:6-11			
74:13-74:22			
75:1-19			
75:21-76:1			
76:3-10			
76:12-22	106	73:16-99:25	
76:24-25			
77:2-78:1			
78:3-22			
79:4-9			
79:11			
79:13			

<u>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</u> <i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
79:15-16			
79:18-21			
79:25-80:10			
80:16-82:16			
82:23			
82:25			
83:2-14			
83:19-21	106	73:16-99:25	
83:24-84:13			
84:20-85:8			
85:23-86:10			
86:12			
86:14-94:17			
94:19-21			
94:23-95:15			
95:19-97:4			
109:3-110:5			
110:8-10			
110:12-16	106	109:3-114:17	
111:6-112:25			
113:5-14			
113:25-114:21			

<u>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</u> <i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
115:6-20			
115:23-24			
116:1-8			
116:10-12			
118:17-119:3			
119:5-18	106	115:6-124:18	
119: 20-21			
120:1-121:5			
121:7-123:2			
123:4-17			
123:20-25			
148:22-149:20			
149:16-20			
150:14	401/402		
150:16-25			
151:1-20	609 MIL4 403 EXCL		
156:4-23	609 MIL4 403 EXCL		
157:1	609 MIL4 403 EXCL		
157:21-24	609 MIL4 403 EXCL		

<u>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</u> <i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
160:19-161:2	401/402 403 LC		
161:4-7	401/402 403 LC		
161:11-17	401/402 403 LC		
163:4-25			
164:3-9			
164:15	106	163:4 – 167:6	
165:20-166:11			
167:3-6			
167:8-16			
168:1-14			
168:16-169:8			
169:18-170:14	106	167:8-174:21	
170:13-14			
170:17-172:11			
172:16-173:5			
174:1-21			
178:22-179:13			
180:5-13	106	178:22-180:21	
182:6-183:9			
183:12-184:1	106	181:15-184:13	
186:14-189:13			
189:16-23	106	184:24-190:8	

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
190:1-8	106	184:24-190:8	
190:13-193:17			
193:21-194:25	106	190:13-195:25	
198:12-200:7			
200:9-202:1	106	198:6-203:20	
205:5-208:23	401/402	205:5-208:22	
209:13-210:9			
210:11-19	401/402		
210:21-19			
214:1-16	106	210:21-216:12	
215:3-216:8			
217:2-219:1			
219:11-222:14	106	217:2-223:4	
229:5-10	106	228:19-231:6	
240:5-8			
240:10-246:17			
246:23-249:25	106	240:5-252:22	
250:3-252:22			

SINCO intends on calling this witness to testify live at trial.

1 IV. SINCO 30(b)(6) (Jonathan Chee)

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**DEPOSITION OF SINCO 30 (b)(6) TAKEN ON SEPTEMBER 16, 2019**  
*(Page and Line Numbers)*

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DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
5:7-8			
5:14-16			
6:18-22			
6:24-7:2			
7:3-5	401/402		
8:9-15	106	8:9-9:11	
9:22-12:13			
12:21-23			
13:4-14	106	12:21-14:8	
13:18-14:8			
14:18-21			
15:5-16:4			
16:8-11	106	14:18-18:25	
16:14-18:1			
18:14-23			
19:5-21:1	106	19:5-21:16	
21:19-22:3	106	21:19-22:16	

<u>DEPOSITION OF SINCO 30 (b)(6) TAKEN ON SEPTEMBER 16, 2019</u> <i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
22:6-16			
23:4-24:7			
24:14-26:14			
26:21-23			
27:1-15	106	23:4-31:17	
27:17-25			
28:5-31:17			
32:1-34:8			
34:25-35:10	106 403	34:10-35:10	
35:24-37:10			
37:14-15	106	35:24-37:15	
38:1-39:3			
39:8-13	403 LC		
39:14-39:15			
39:18-40:6	106	39:14-40:23	
40:12-23			

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
41:7-42:6			
42:9-12			
42:14-43:16			
43:25	106	41:7-46:15	
44:4-6			
44:12-23			
45:1-10			
46:14-15			
46:16-48:1			
48:19-50:17			
50:19-24			
51:1-52:6			
52:11	RD 401/402		
53:22-23	MIL TR		
53:25	MIL TR		
54:5-8	MIL TR		
54:14-55:11	MIL TR		

DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
56:5-12			
56:16-24			
57:5-8			
57:19-58:6	106	56:5-60:16	
58:10-23			
58:25			
59:2-18			
60:4-16			
61:6-62:22			
63:10-68:19	106	61:3 -70:21	
68:23-69:17			
70:9-21			

Dated: September 8, 2021

Respectfully submitted,

ROPER S MAJESKI PC

By: /s/ Lael Andara

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 DANIEL E. GAITAN  
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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

VS.

SINCO ELECTRONICS (DONGGUAN) CO., LTD.; XINGKE ELECTRONICS (DONGGUAN) CO., LTD.; XINGKE ELECTRONICS TECHNOLOGY CO., LTD.; SINCOO ELECTRONICS TECHNOLOGY CO., LTD.; MUI LIANG TJOA (an individual); NG CHER YONG aka CY NG (an individual); and LIEW YEW SOON aka MARK LIEW (an individual).

## Defendants.

Case No. 3:17-CV-05517-EMC

Action Filed: September 22, 2017

**REPLY TO PLAINTIFF'S OBJECTIONS  
TO DEFENDANTS' DEPOSITION  
DESIGNATIONS AND NOTICE OF  
COUNTER-DESIGNATIONS**

Date: October 5, 2021  
Time: 3:00 p.m.  
Place: Courtroom 5, 17th Floor

**Judge: Honorable Edward M. Chen**

**Trial: November 1, 2021**

1 Plaintiff SinCo Technologies Pte. Ltd, ("SINCO") hereby provides objections and counter  
 2 designations to Defendants' identified Deposition testimony. Any designation including discussion  
 3 by the attorney, other than objections, with the witness are intended as it provides context for later  
 4 testimony.

ABBREVIATION	OBJECTIONS
106	Rule of completeness to designation. (page:line to page:line). Objections removed.
401/402	Testimony in designation not relevant to claims or defenses in this action.
403	Designation causes unfair prejudice, confuses the issues, misleads the jury, wastes time (asked and answered).
609	Presumption Against Reference to Prior Conviction over ten years old. <sup>1</sup>
MIL	Subject to motion <i>in limine</i> .
LC	Calls for legal conclusion.
RD	Testimony is not based on Personal Knowledge, but simply reading a document provided by
NR	Non-responsive; no question pending.
SPEC	Calls for speculation.
V	Vague.
M	Misstates the testimony.

23 Any objections are presumed removed from any deposition testimony read or played before  
 24 the Jury. Defendants designations were inconsistent<sup>2</sup> in skipping or designation of attorney  
 25 objections along with designation of the counsel asking the question (which is not spoken, and not  
 26 on the video), in either event such material would not be read or appear on the deposition video.  
 27 SINCO's counter designations again assumes that any objections by counsel will be removed from  
 28 the testimony, as well as reference to the attorney asking the question.

## **COUNTER-DESIGNATIONS AND OBJECTIONS**

These counter-designations anticipate the removal of objections and interaction not in the form of a question by counsel as presented to the Jury.

## I. Minh Chi Nguyen (United States)

DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018			
(Page and Line Numbers)			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
5:25-6:8			
8:1-9:8			
9:10 — 9:17			
9:19-21			
9:24-10:1			
10:13-10:24	106	10:8-:11:1	
11:22-13:12	106	11:19-13:18	Rule 401 / 403. Part of Plaintiff's counter-designation (13:18) is only one line of a question and no response is provided and thus it should not be included. Beyond this issue, Defendants have no objection to Plaintiff's counter-designation.
14:6-10			
14:13-14			
14:17-23			
15:8-16:21			
17:21-18:6	106 SPEC	17:21-18:20; 20:2-21:16; 25:7-26:18 and 27:24-28:7	Rule 401 / 403 / 106. Plaintiff's counter-designations do not correct a misleading impression; rather, it
18:12-13			

1	<b>DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018</b>		
2	<i>(Page and Line Numbers)</i>		
3			seeks to admit testimony regarding a completely separate topic (i.e., employment status of Liew and Ng).
4			
5			
6			
7	31:11-31:23	106	31:11-31:25
8			
9			
10	37:12-38:2	106	36:4-38:13
11			Rule 401 / 403 / 106. 36:4 - 37:11 does not correct a misleading impression; rather, it discusses propriety information for another company — not the original company discussed in Defendants' original designations.
12			
13	52:11-53:12		
14	56:5-60:19		
15			
16	62:15-18	106	52:11-54:25 and 55:3-62:24
17			See Defendants MIL No. 5. 52:13-54:25, although discussing the same project, this pertains to the issue of trade secrets; it is irrelevant for claims at issue in the federal case.
18	63:15-21	106	63:2-63:25
19	64:21-65:19	106	64:9-67:23
20			
21			
22	71:22-72:2	106 M	70:1-72:2
23			In the event Plaintiff's counter-designations are admitted into evidence, under Fed. R. Evid. 106, Defendants counter- designate: 72:14- 73:24; 74:6-9; ; 74:16- 74:19-20; 79:4-80:15.
24			
25			
26	72:14-73:7	106	72:14-73:21
27			In the event Plaintiff's counter-designations are admitted into evidence, under Fed. R. Evid. 106, Defendants counter- designate: 72:14-
28			

<b>DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018</b>			
<i>(Page and Line Numbers)</i>			
			73:24; 74:6-9; ; 74:16-74:19-20; 79:4-80:15.
99:24-101:3	106	98:21-101:23	
101:24-102:5			
106:9-107:6		103:16-110:18	Hearsay. Page 103:16-22 repeats the witness's prior declaration and counsel's statement is not required to be admitted under Fed. R. Evid. 106.
109:2-110:18	106		
113:8-23	106	113:8-114:25	Under Fed. R. Evid. 106, 113:8-114:25 and 115:25-9 should be included.
146:3-147:18			Hearsay and Lack of Personal Knowledge. In pages 150:10-151:11, the witness is repeating what he heard from other Plaintiff employees and even admits "Firsthand knowledge, no I do not know."
151:12-152:13	106	146:3-147:24; 149:7-24 and 150:1-151:20	
154:9-156:4		154:9-157:1 and 157:3-8	
156:6-19	106		
157:9-19			
158:14-24	106	157:9-159:24	
163:25-165:12	106	163:8-165:12	Hearsay and FRE 403. 163:8-163:25 is an incomplete answer to a question that was not counter-designated and also repeats the witness's prior declaration.
168:2-19	106	165:19-171:18	Hearsay and FRE 403. 165:19-165:25 repeats the witness's prior out-of-court statement; 166:20-24

			<b>DEPOSITION OF MINH CHI NGUYEN, TAKEN ON AUGUST 24, 2018</b>
<i>(Page and Line Numbers)</i>			
			(same); and the remainder of Plaintiff's counter designation is irrelevant or should be excluded under FRE 403.
171:22-172:13	106	171:22-172:15	

SINCO intends on calling this witness to testify live at trial.

## II. BRYAN LIM (Singapore)

			<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>	
<i>(Page and Line Numbers)</i>				
PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
	5:3-4			
	5:5-11			
	5:16-6:6			
8:10-11:7				
	9:1-12:13	106	8:10-12:13	
11:17-24				
13:3-16	13:3-11	106	12:20-13:16	
14:2-15:16	14:2-14:6		14:2-16:4	
	15:8-25	106		
	17:6-18:3	106	16:18-23:4	

1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3		18:6-17		
4		19:2-9		
5		19:12-13		
6		19:16-20:1		
7		20:4-8		
8		20:14-16		
9		20:18		
10		20:21-21:5		
11		21:20-23:4		
12		24:1	401/402 NR	
13	24:2-25:15			
14		25:16-27:14	106	25:16-28:25
15	25:22-27:14			
16		29:1-4	M	Testimony is relevant because it pertains to SinCo Silicon Rubber, with whom one of the defendants had entered into an employment agreement. No objections to Plaintiff's counter-designations (28:17-30:17).
17		29:7	<b>RD L 401/402 403</b>	
18		29:9-12	<b>L 401/402 403</b>	
19		29:16	401/402 403	
20		30:12-17	L 401/402 403	28:17-30:17
21		30:21		
22		30:23-24	106	30:23-31:22
23		31:2-9		
24		31:11		
25		31:19-22		

1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3	32:1-3			
4	32:5-38:15	32:5-6	401/402	
5		32:10-13	106	
6		33:15	401/402	
7		33:17-35:12	106	
8		35:15-36:21	32:5-40:13 106	
9		36:23-38:15	106	
10		38:23-39:11	106	
11	39:6-40:13	39:13-24	M 106	
12		40:1-14	106	
13		41:7-42:8	106	42:8-11 are counsel's objections; these should be excluded.
14			41:7-42:11	
15	41:11-42:1			
16	42:12-43:15	42:12-15	106 V	The question is not vague; the witness was able to answer the question.
17		42:18-23	106 V	The question is not vague; the witness was able to answer the question.
18		43:2-19	106 M	The question does not misstate testimony. In 43:8, the witness admits the customer would speak to Defendants; thus, counsel's follow-up question that a customer would speak with Defendants on its own does not misstate testimony.
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27				
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1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3		43:21-22	106	Plaintiff's raises a FRE 106 objection but does not counter-designate any testimony that should be admitted for completeness.
4		43:24-44:2	V 106	The question is not vague; the witness was able to answer the question.
5		44:4	106	Plaintiff raises a FRE 106 objection but does not counter-designate any testimony that should be admitted for completeness.
6		44:7-8	106	Plaintiff raises a FRE 106 objection but does not counter-designate any testimony that should be admitted for completeness.
7		44:10-45:21		
8		45:23-46:11	106	45:23-46:22
9	46:23-47:16	46:23-25	V 106	The question is not vague; the witness was able to answer the question.
10		47:4-9		
11		47:11-13		
12		47:19-48:5		
13		48:7-48:14		
14		48:16-51:10		
15	49:12-51:6			
16		51:12-13		
17		51:15-19		

<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>				
<i>(Page and Line Numbers)</i>				
<b>PLAINTIFF'S DEPOSITION DESIGNATION</b>	<b>DEFENDANTS DEPOSITION DESIGNATION</b>	<b>OBJECTIONS TO DEFENDANTS DESIGNATIONS</b>	<b>PLAINTIFFS' COUNTER- DESIGNATION</b>	<b>OBJECTIONS TO COUNTER- DESIGNATION</b>
51:20-54:11				
54:20-55:6	54:20-24 55:1-2	V V		The question is not vague; the witness was able to answer the question.
	55:4-13	403 401/402 LC	55:4-59:5	The witness's inability to answer basic questions regarding his motivations and reasons for bringing a lawsuit against Defendants — had they not used the "SinCo" name — is relevant because it demonstrates the level of animosity and bias the witness had against Defendants. This suggests that SinCo SG brought a meritless case against Defendants because the two were in direct competition for customers after SinCo DG was sold, rather than due to Trademark infringement.
	55:18-23	403 401/402 LC L		
	56:1-7	403 401/402 LC L		
	56:9-15	403 401/402 LC		
	56:18-24	403 401/402 LC		
	57:2	403 401/402 LC		
	57:4-13	403 401/402 LC		
	57:16-24	NR 401/402 LC		
	58:3-9	NR 401/402 LC L		
	58:12-59:1	403 401/402 LC		
	59:4-10	403 401/402 LC		
	59:13-19	NR L		
	59:22-25			

<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>				
<i>(Page and Line Numbers)</i>				
PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	61:1-62:13	106	59:20-62:16	
	62:17-20	401/402 NR	62:17-24	62:17-24 contains an exchange between counsel only, and thus this exchange be omitted.
	63:12-17	403 401/402 LC	63:12 -65:16	
	63:20-64:16			
	64:19-65:2	106	65:17-72:8	
	65:5 - 16			
64:24-68:18	65:17-66:12			
	66:17-67:22			
	68:1-20			
	68:23-25			
	69:2-20			
69:4-11				
	70:2-72:4			
	72:18-77:11			
	77:25-78:23	106	72:18-85:12	
	79:2-81:6			
	82:24-83:2			
	84:8-85:12			
	85:18-21			

	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 4, 2019</b>			
	<i>(Page and Line Numbers)</i>			
84:10-92:19	85:25-87:6	106	85:18-91:14	
	87:8-88:19			
	89:21-90:7			
	90:10-91:6			
	91:12-14			
	91:18			

	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019</b>			
	<i>(Page and Line Numbers)</i>			
PLAINTIFF'S DEPOSITION DESIGNATION	DEFENDANTS DEPOSITION DESIGNATION	OBJECTIONS TO DEFENDANTS DESIGNATIONS	PLAINTIFFS' COUNTER- DESIGNATION	OBJECTIONS TO COUNTER- DESIGNATION
	91:20-93:1			
	93:23-95:1			
94:10-96:5	95:3-9			
	95:12-96:18			
97:5-98:23	97:5-98:9			
	98:11-99:4			
	99:6			
	99:10-100:17	V		Nothing is vague about the question nor answer. The witness states he purportedly heard Defendants were pretending to be Plaintiff and that he subsequently clarified with the customer that this wasn't true, which undermines any

1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3				argument that there was “actual confusion”.
4	99:14-100:17			
5		101:5-10		
6	101:15-102:21		101:5-102:21; 103:1-105:4 and	
7	103:1-105:4		106:18-23	
8	106:18-23			
9	108:22-111:4			
10		V 106	108:22-111:12	
11		110:19-111:12		
12		112:2-11	401/402 403 RD LC L	This line of questioning is relevant because it demonstrates that the witness had made prior inconsistent statements (i.e., Plaintiff’s complaint and his inability to determine whether this is true or not).
13		12 112:24-113-	401/402 403 RD LC L	
14		113:15-16	401/402 403 RD LC L	
15		1 113:18-114-	401/402 403 RD LC L	
16	114:23-115:12	114:25-115:3	106	114:23-115:20
17		115:9-12	106	114:23-115:20
18		116:25-117:7	106	116:15-117:7
19		118:11-14		
20		118:16		
21		118:18-119:7		
22	118:22-119:5			
23		119:9-10		
24		119:12-22		
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27				
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1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3		120:1-4		
4	120:6-20			
5		121:10-13		
6		121:17-22	106	121:4-122:20
7	121:18-122:20	121:24-122:4		
8		123:1-3	V 106	
9		123:6	106	
10		123:8	V 106	
11		123:10-14	V 106	123:1-124:11
12		123:16-17	106	
13		123:19-20	L 106	
14		123:22-124:11	106	
15		127:9-128:2		124:21-125:24;
16		128:4-5	106	126:9-128:5
17		133:22-134:5	106	133:22-134:14
18		136:6-22	106	136:6-138:11
19		136:25-137:20		
20		138:24-140:15		
21	139:21-143:7	140:19-141:5	106	138:24 -143:7
22		153:19-22		
23		154:9-155:13	106	153:19-155:25
24		155:15-25		
25		156:23-162:3	V LC RD	156:23-158:4
26				The exchange is neither vague nor a
27				
28				

1	<b>DEPOSITION OF BRYAN LIM, TAKEN ON APRIL 5, 2019</b>			
2	<i>(Page and Line Numbers)</i>			
3	156:23-158:4			legal conclusion. Counsel is reading from a document in which the deponent corresponded with a non-party regarding the sale of SinCo DG; the fact that the deponent was aware of an upcoming sale and received compensation for it suggests that he consented to the sale.
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	165:16-17			The deponent is confronted by his prior statement from a document. The admission of such evidence is proper for its truth and Defendants' designations are proper.
	165:20-166:24			
	165:24-175:19	167:2-23		
		168:20-169:17	106 RD	165:16-171:10 and 172:2- 174:12
		<b>169:21-170:4</b>		
		<b>170:6</b>		
		<b>170:19-171:4</b>		
		<b>174:14-175:19</b>		
	177:2-178:18			
		179:2-180:23		
	179:22-180:19		106	179:2-184:12
		181:4-18		
	181:19-184:12			
		185:9-186:11	M	Nothing is misleading. The witness answers the question in the affirmative (186:14). As such, the proper designation should be 185:9-186:14.

1           **III. JONATHAN CHEE (Singapore)**

<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>			
<i>(Page and Line Numbers)</i>			
<b>DEFENDANTS' DEPOSITION DESIGNATION</b>	<b>OBJECTIONS TO DESIGNATIONS</b>	<b>PLAINTIFF COUNTER- DESIGNATION</b>	<b>OBJECTIONS TO COUNTER-DESIGNATION</b>
6:4-11			
6:22-24	401/402		
7:12-16			
8:10-13			
8:18-25			
9:15-25	<b>609 MIL4 403 EXCL</b>		<i>See Defendants' Opposition to MIL No. 4.</i>
13:2-5			
16:6-17:17	401/402 106	16:6-17:14	
17:23-18:16	106	17:23-21:25	
25:5	106	25:1-31:16	FRE 401 / 403 / 701 / Speculation. In Plaintiff's counter- designations (29:20- 31:16), the witness admits, "Yes I would be speculating. I would not know..." and opines about "minority oppression" and other complex business concepts even though he has not been designated or qualified as an expert witness (Rule 701).
25:7-28:16	106		
28:18-19	106		
28:21-29:20	106		
39:18-42:8	106	38:11-44:17	
42:19-44:17			
47:4-49:18			
49:21-50:22			

<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>			
<i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
51:1-15			
52:17-56:25	106	52:17-54:12 and	
63:18-64:19	401/402 106	63:3-64:14	Testimony regarding Plaintiff's business structure and the "ultimate decision maker" is relevant to SinCo SG's conduct in this case.
64:24-25			
65:3-66:11			
66:13-14			
66:16-67:15	401/402 106	64:15-70:6	
67:18-68:1			
68:5			
68:7-70:6			
71:4-8	106	71:4-8; 72:14-73:1 and 73:3-15	
73:16-25			
74:3			
74:6-11			
74:13-74:22			
75:1-19			
75:21-76:1			
76:3-10			
76:12-22			
76:24-25			

<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>			
<i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
77:2-78:1			
78:3-22			
79:4-9			
79:11			
79:13			
79:15-16			Rule 401 and 403. Testimony from 97:5-99:25 pertain to tooling and design of products (trade secrets). See Defendants MIL No. 5.
79:18-21			
79:25-80:10			
80:16-82:16			
82:23			
82:25			
83:2-14			
83:19-21	106	73:16-99:25	
83:24-84:13			
84:20-85:8			
85:23-86:10			
86:12			
86:14-94:17			
94:19-21			
94:23-95:15			
95:19-97:4			
109:3-110:5	106	109:3-114:17	Rule 106. Plaintiff's counter-designation

<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>			
<i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
110:8-10			cuts off 114:18-21, in which Plaintiff admits that counsel's statement is true.
110:12-16			
111:6-112:25			
113:5-14			
113:25-114:21			
115:6-20			
115:23-24			
116:1-8			
116:10-12			
118:17-119:3			
119:5-18	106	115:6-124:18	
119: 20-21			
120:1-121:5			
121:7-123:2			
123:4-17			
123:20-25			
148:22-149:20			
149:16-20			
150:14			Plaintiff's failure to prosecute other companies using the "SinCo" name is relevant as it goes towards Defendants' affirmative defenses.
150:16-25	401/402		

	<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>		
	<i>(Page and Line Numbers)</i>		
1 2 3 4	151:1-20	609 MIL4 403 EXCL	<i>See Defendants' Opposition to MIL No. 4.</i>
5 6	156:4-23	609 MIL4 403 EXCL	
7 8	157:1	609 MIL4 403 EXCL	
9 10	157:21-24	609 MIL4 403 EXCL	
11	160:19-161:2	401/402 403 LC	<i>Defendants' designations are proper impeachment under FRE 608(b) (specific instances of untruthful act). Deponent admits being the COO of a company despite being disqualified.</i>
12	161:4-7	401/402 403 LC	
13	161:11-17	401/402 403 LC	
14	163:4-25		
15	164:3-9		
16	164:15		
17	165:20-166:11		
18	167:3-6		
19	167:8-16		
20	168:1-14		
21	168:16-169:8		
22	169:18-170:14		
23	170:13-14		
24	170:17-172:11		
25	172:16-173:5		
26			
27			
28			

<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>			
<i>(Page and Line Numbers)</i>			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
174:1-21			
178:22-179:13	106	178:22-180:21	
180:5-13			
182:6-183:9	106	181:15-184:13	
183:12-184:1			
186:14-189:13	106	184:24-190:8	
189:16-23			
190:1-8	106	184:24-190:8	
190:13-193:17	106	190:13-195:25	
193:21-194:25			
198:12-200:7	106	198:6-203:20	
200:9-202:1			
205:5-208:23	401/402	205:5-208:22	The deponent's decision to amend language at issue in this case suggests that the deponent understood such language to create an ambiguity and thus is relevant to the issue of whether Defendants Mark Liew and Cy Ng were employees of SinCo SG or Xingke.
209:13-210:9			Evidence that contradicts SinCo SG's allegations in the complaint (a party admission) is proper impeachment by specific contradiction,
210:11-19	401/402		

		<b>DEPOSITION OF JONATHAN CHEE, TAKEN ON APRIL 4, 2019</b>	
	<i>(Page and Line Numbers)</i>		
			which permits extrinsic evidence. <i>See US v. Antonakeas</i> , 255 F.3d 714, 724 (9th Cir. 2001).
210:21-19			
214:1-16	106	210:21-216:12	
215:3-216:8			
217:2-219:1			
219:11-222:14	106	217:2-223:4	
229:5-10	106	228:19-231:6	
240:5-8			
240:10-246:17			
246:23-249:25	106	240:5-252:22	
250:3-252:22			

SINCO intends on calling this witness to testify live at trial.

#### IV. SINCO 30(b)(6) (Jonathan Chee)

		<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>	
	<i>(Page and Line Numbers)</i>		
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER- DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
5:7-8			
5:14-16			
6:18-22			
6:24-7:2			
7:3-5	401/402		

<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>			
<i>(Page and Line Numbers)</i>			
8:9-15	106	8:9-9:11	
9:22-12:13			
12:21-23			
13:4-14	106	12:21-14:8	
13:18-14:8			
14:18-21			
15:5-16:4			
16:8-11	106	14:18-18:25	
16:14-18:1			
18:14-23			
19:5-21:1	106	19:5-21:16	
21:19-22:3	106	21:19-22:16	

DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019			
(Page and Line Numbers)			
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
22:6-16			
23:4-24:7			
24:14-26:14			
26:21-23			

1	<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>		
2	<i>(Page and Line Numbers)</i>		
3	27:1-15		
4	27:17-25		
5	28:5-31:17	106	32:4-31:17
6	32:1-34:8		
7	34:25-35:10	106 403	34:10-35:10
8	35:24-37:10		
9	37:14-15	106	35:24-37:15
10			
11	38:1-39:3		
12			
13	39:8-13	403 LC	
14			
15	39:14-39:15		
16			
17	39:18-40:6	106	39:14-40:23
18			
19	40:12-23		
20			

21	<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>			
22	<i>(Page and Line Numbers)</i>			
23	<b>DEFENDANTS' DEPOSITION DESIGNATION</b>	<b>OBJECTIONS TO DESIGNATIONS</b>	<b>PLAINTIFF COUNTER- DESIGNATION</b>	<b>OBJECTIONS TO COUNTER-DESIGNATION</b>
24	41:7-42:6			
25	42:9-12			
26	42:14-43:16			
27				
28				

		<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>	
	<i>(Page and Line Numbers)</i>		
43:25			
44:4-6			
44:12-23			
45:1-10	106	41:7-46:15	
46:14-15			
46:16-48:1			
48:19-50:17			
50:19-24			
51:1-52:6			
52:11	RD 401/402		The witness answers a question posed in 52:2-6 and thus Defendants' designation is relevant.
53:22-23	MIL TR		Defendants agree to withdraw this designation.
53:25	MIL TR		Defendants agree to withdraw this designation.
54:5-8	MIL TR		Defendants agree to withdraw this designation.
54:14-55:11	MIL TR		Defendants agree to withdraw this designation.

		<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>	
	<i>(Page and Line Numbers)</i>		
DEFENDANTS' DEPOSITION DESIGNATION	OBJECTIONS TO DESIGNATIONS	PLAINTIFF COUNTER-DESIGNATION	OBJECTIONS TO COUNTER-DESIGNATION
56:5-12			
56:16-24			

		<b>DEPOSITION OF SINCO 30(b)(6), TAKEN ON SEPEMBER 16, 2019</b>	
	<i>(Page and Line Numbers)</i>		
1	57:5-8		
2	57:19-58:6		
3	58:10-23		
4	58:25	106	56:5-60:16
5	59:2-18		
6	60:4-16		
7	61:6-62:22		
8	63:10-68:19	106	61:3 -70:21
9	68:23-69:17		
10	70:9-21		

14  
15 Dated: September 10, 2021.

ARNOLD &amp; PORTER KAYE SCHOLER LLP

16  
17 By: /s/ Douglas A. Winthrop  
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22  
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## CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served a copy of the foregoing DEFENDANTS' REPLY TO OBJECTIONS TO DEPOSITION DESIGNATIONS on September 14, 2021.

*/s/ Douglas A. Winthrop*  
**DOUGLAS A. WINTHROP**